

1 DAYLE ELIESON  
2 United States Attorney  
3 District of Nevada

4 MARK E. WOOLF  
5 Assistant United States Attorney  
6 501 Las Vegas Boulevard South, Suite 1100  
7 Las Vegas, Nevada 89101  
8 702-388-6336  
9 mark.woolf@usdoj.gov

10 *Attorneys for the United States*

11 **UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA**

13 9 Mercedes Rojas,

14 Case No. 2:18-cv-00538-JCM-NJK

15 Plaintiff,

16 **Stipulation to Stay**

17 v.

18 **(First Request)**

19 12 United States of America,

20 13 Defendant.

21 15 The parties, through their respective counsel, hereby stipulate to stay this matter. The  
22 16 parties are in active settlement negotiations and believe they will be able to resolve this matter  
23 17 without continued litigation. This is the parties' first request to stay this matter, and the  
24 18 stipulation is not sought for purposes of delay. Rather, the parties request a stay to permit  
25 19 them to focus their time and resources on settlement discussions. After conferring, the parties  
26 20 believe a stay of 60 days, or until **February 11, 2019**, should be sufficient.

21 21 While the parties are optimistic they will be able to resolve this matter, they reserve  
22 22 the opportunity to request an early settlement conference with either the assigned magistrate  
23 23 judge or another magistrate judge, as determined by the Court, should they be unable to  
24 24 resolve this matter during the course of the stay. To that end, the parties' also request that  
25 25 the Court schedule a status conference, to be automatically vacated in the event of resolution,  
26 26 shortly after expiration of the stay. In advance of the status conference, the parties will, if  
27 27 necessary, submit a joint status report indicating whether an early settlement conference  
28 28 would be beneficial.

1           **WHEREFORE**, the parties respectfully request that this stipulation be granted and  
2 the case stayed until **February 11, 2019**, and that the Court set a Status Conference, at a time  
3 and date convenient to the Court, shortly after expiration of the stay.

4           Dated this 13th day of December 2018.

5           **GERALD I. GILLOCK & ASSOCIATES**

6           *s/ Jessica M. Goodey*  
7           **GERALD I. GILLOCK, ESQ.**  
8           **JESSICA M. GOODEY, ESQ**  
9           428 South Fourth Street  
10           Las Vegas, NV 89101

11           *Attorneys for Plaintiff*

12           **DAYLE ELIESON**  
13           United States Attorney

14           *s/ Mark E. Woolf*  
15           **MARK E. WOOLF**  
16           Assistant United States Attorney  
17           *Attorneys for the United States*

18           GRANTED. If dismissal papers have  
19           not been filed, a status report shall  
20           be filed by February 11, 2019.

21           **IT IS SO ORDERED:**

22             
23           **UNITED STATES DISTRICT JUDGE**  
24           **UNITED STATES MAGISTRATE JUDGE**

25           **DATED:** December 14, 2018